

## **REMARKS**

### **Claim Status**

Applicants express their sincere appreciation to the Examiners, Mr. Khawar Iqbal and Mr. George Eng, for the courtesies extended to applicants' representative in the telephone interview conducted on August 25, 2009, and for their kind assistance in furthering prosecution on the merits of the instant application. During the telephone interview, the subject matter of independent claims 1 and 6 was discussed. No agreement with respect to patentability of the claims was reached. The following remarks take into account the substance of the telephone interview.

Claims 1-6 are currently pending, with claims 1 and 6 being in independent form. The claims have not been amended. Reconsideration of the application is respectfully requested.

### **Overview of the Office Action**

Claims 1-6 stand rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Pub. No. 20040166843 (“*Hahn*”) in view of U.S. Pub. No. 2003/0039237 (“*Forslow*”).

Applicants have carefully considered the Examiner's rejection and the comments provided in support thereof, and respectfully disagree with the Examiner's analysis. For the reasons which follow, it is respectfully submitted that all claims of the present application are patentable over the cited art.

### **Patentability of the Independent Claims Under 35 U.S.C. §103(a)**

Independent claim 1 recites that “a non-unique address via the associated addressing scheme from each of said networks connected to the terminal (10)” is received. Independent

claim 6 recites the step of “independently managing a plurality of said communications networks after receiving a non-unique address from each of said networks connected to said terminal”. The combination of *Hahn* and *Forslow* fails to teach or suggest a system and/or method including a mobile terminal that is modified to operate with multiple data communications networks and non-unique addresses, as defined and recited in independent claims 1 and 6.

The Examiner (at pgs. 3 and 5 of the Office Action) has acknowledged that *Hahn* fails to teach or suggest a “a non-unique address managing independently each of plural communications networks”, as recited in independent claims 1 and 6, and cites *Forslow* for this feature.

Applicants disagree, however, that the combination of *Hahn* and *Forslow* achieves the subject matter of independent claims 1 and 6. There is nothing in *Hahn* and *Forslow* either teaching or suggesting the subject matter recited in independent claims 1 and 6.

*Forslow* discloses a system and method for communication between a mobile station and an external network. *Forslow* (paragraph [0009]; Fig. 2) describes a mobile communications system that supports both circuit-switched and packet-switched communications and includes a circuit-switched network 35 and a packet-switched network 51.

*Forslow* (paragraph [0022]) additionally describes the selection of circuit-switched services for real time data streams (referred to as application flows) such as audio and video, or the selection of packet-switched bearers for non-real time applications such as surfing the worldwide web, file transfer, e-mail and telnet, all of which require fast channel access and bursty data transfer capability. *Forslow* (paragraph [0024]) explains that the circuit-switched services are performed based on a determination of whether a circuit-switched bearer or a packet-switched bearer is better suited to transport the application flow for a corresponding

quality of service (QoS) associated with real-time or non real-time applications. Different packet-switched and circuit-switched services co-exist within the network, but the services are always located in the same network. *Forslow* fails to teach the simultaneous management of a plurality of networks that are connected to the same terminal. Consequently, the *Forslow* technique is not intended to, need not, and does not deal with or provide the ability to eliminate the possibility of receiving the same (i.e., a non-unique) address from two different networks which would violate the conventional principle of unique addressing as discussed at pg. 9, line 23 to pg. 10, line 21 and pg. 12, line 8 to pg. 13, line 10 of the instant specification.

Accordingly, even when combined with *Hahn*, *Forslow* fails to teach or suggest “a dedicated architecture manager integrated into said terminal ... configured to manage separately simultaneous connections with each of said plural communications networks, and configured to manage independently each of said communications networks after receiving a non-unique address via the associated addressing scheme from each of said plural communications networks connected to the terminal”, as recited in independent claim 1 and correspondingly recited in independent claim 6. Rather, *Forslow* teaches a system in which a terminal is connected to only one external network at a time and the addresses sent by this communication network are always different, i.e., *Forslow* teaches a single network having a unique address planning methodology. As such, *Forslow* does not and cannot provide the Examiner-acknowledged missing teachings of *Hahn*.

*Forslow* teaches (Fig. 1; (20)) that the external network can be a LAN, and (Fig. 2; (58)) that the external network can also comprise an ISP server (see Fig. 10 and/or Fig. 11, step 170). *Forslow* (Fig. 2) depicts only one network (56) that is connected with the disclosed GGSN equipment (54). In contrast, Fig. 2 of applicants’ instant specification depicts a pair of different

GGSN (30, 30') equipment that are connected to different networks (40, 41, 42, 50, 51 and 52), with each possessing a set of services A, B, ... , etc. The arrangement of Fig. 2 necessitates permitting the “dedicated architecture manager integrated into said terminal ... to process simultaneously operation of said terminal when connected to each of said plural communications networks, and ... to manage independently each of said plural communications networks after receiving a non-unique address via the associated addressing scheme from each of said plural communications networks connected to the terminal”, as recited in independent claim 1 and correspondingly recited in independent claim 6. *Forslow* simply fails to teach or suggest these limitations or operating functionality.

*Forslow* (paragraph [0029], lines 3-6) explains that an external network entity performs only a single common access procedure for subsequent communications using either the circuit-switched network or the packet-switched network. The skilled person readily appreciates that applicants’ claimed invention requires performance of more than one access procedure, because independent claim 1 recites that the at least one architecture manager in the terminal is “configured to process simultaneously operation of said terminal when connected to each of said plural communication networks”. *Forslow* does not teach a system in which this occurs.

Moreover, *Forslow* (paragraph [0030], lines 1-2) explains that “the common access procedure includes a common authentication procedure for authenticating the identity of the mobile station with the external network entity”. *Forslow* (paragraph [0031], lines 3-7) additionally explains that the common access procedure configures the terminal for communication with the external network for both the circuit-switched and packet-switched networks. *Forslow* (paragraph [0032], lines 36-38) further explains that by permitting individual application flows to individually select the type of transfer mechanism, i.e., either circuit-

switched or packet-switched bearer, a higher QoS for different types of applications is provided.

*Forslow* (paragraph [0032], lines 5-7) then goes on to explain that the common access procedure is used for all application flows in a session. *Forslow fails* to teach or suggest “a dedicated architecture manager integrated into said terminal ... configured to manage separately simultaneous connections with each of said plural communications networks and configured to manage independently each of said plural communications networks after receiving a non-unique address via the associated address scheme from each of said plural communications networks connected to the terminal”, as recited in independent claim 1 and correspondingly recited in independent claim 6.

*Forslow* (paragraph [0050] to [0051]) merely describes a standard activation procedure for GPRS access. These sections of *Forslow fail* to teach or suggest the claimed “architecture manager ... [which is] configured to manage independently each of said communications networks after receiving a non-unique address via the associated addressing scheme from each of said plural communications networks connected to the terminal ” as recited in independent claim 1 and correspondingly recited in independent claim 6.

*Forslow* (paragraph [0094] to [0096]) describes access that is performed using one common external network (see paragraph [0094], line 1; (170)), with a “single” common access via two independent bearers (in the same network), i.e., one bearer for GPRS packet services and one bearer for GSM circuit services. That is, *Forslow* teaches the use of only one network at a time, with a set of different services based on the indicated type of service. Independent claim 1, in contrast, recites “a dedicated architecture manager ... configured to manage separately simultaneous connections with each of said plural communications networks, and configured to manage independently each of said plural communications networks”, and independent claim 6

recites corresponding limitations. Such a configuration is not provided for in the *Forslow* system because only one gateway, i.e., GGSN (54) is present for connection to the external network. Thus, in the system of *Forslow* there is no way to achieve an effective simultaneous connection of the terminal to a plurality of communications networks to enable independent simultaneous management of each of the plural communications networks when receiving a non-unique address via the associated addressing scheme from each of the plural communications networks connected to the terminal. *Forslow* fails to provide that which *Hahn* lacks.

An important characteristic of the claimed invention is the ability to work with several non-unique addresses each using the service addressing scheme as defined by claims 1 and 6. The ETSI standard, described at paragraph [0019] of the instant publication, requires that the same terminal be connected simultaneously with several communications networks, but fails to provide a way to accomplish this result. Paragraphs [0014] thru [0017] of the instant publication explain that a network sends an address to a terminal. Paragraph [0019] of the instant publication describes an addressing problem associated with the reception of two (or more) identical addresses (i.e. non-unique addresses). In the claimed invention, each network interface is associated with one address that originates from one specific network. This concept is described at paragraphs [0068] thru [0070] of the instant publication (see “only one address”). Without the advantages provided by the claimed invention, a “normal” terminal can only work with a unique addressing scheme having different addresses so as to not violate the principle of unique addressing (see, for example, paragraphs [0071] to [0072] of the instant publication). As described at paragraph [0073] of the instant publication, the claimed invention permits a terminal to operate if it receives an identical address and addressing scheme because as, described at paragraph [0073], the terminal is able to receive and process two identical addresses, i.e., non-unique addresses.

This characteristic and the configuration of a mobile terminal to advantageously simultaneously function with several communications networks are neither explained nor described in the *Hahn* or *Forslow* publications. *Hahn* and *Forslow* each fail to provide any explanation or teaching whatsoever with respect to management of non-unique addresses of different communications networks that are received when a mobile terminal is simultaneously connected with several communications networks. In particular, *Hahn* and *Forslow* are silent with respect to the problem of receiving an identical address (i.e., a non-unique address) from two different communications networks, both of which are operating with the same addressing scheme, as recited in independent claims 1 and 6.

By virtue of the above-discussed differences between the recitations of independent claims 1 and 6 and the teachings of *Hahn* in combination with the teachings of *Forslow*, and the lack of any clear basis or motivation for modifying the reference teachings to achieve applicants' claimed invention, independent claims 1 and 6 are deemed to be patentable over *Hahn* and *Forslow* under 35 U.S.C. §103.

### **Dependent claims**

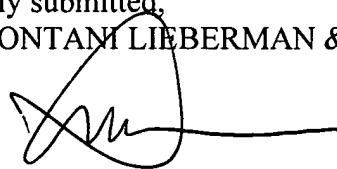
In view of the patentability of independent claims 1 and 6, for the reasons presented above, each of dependent claims 2-5 is patentable therewith over the prior art. Moreover, each of these claims includes features which serve to still further distinguish the recited invention over the applied art.

**Conclusion**

Based on all of the above, applicants submit that the present application is now in full and proper condition for allowance. Prompt and favorable action to this effect, and early passage of the application to issue, are solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned to facilitate an early resolution of any outstanding issues.

Respectfully submitted,  
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